## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

**UA LOCAL 13 & EMPLOYERS GROUP** INSURANCE FUND, Individually and on Behalf of All Others Similarly Situated,

Civil Action No. 1:19-cv-10161-LLS-RWL

Plaintiff.

**CLASS ACTION** 

VS.

PLAINTIFFS' NOTICE OF MOTION AND UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT, CERTIFICATION OF THE

SEALED AIR CORPORATION and

CLASS, AND APPROVAL OF NOTICE TO THE CLASS

WILLIAM G. STIEHL,

Defendants.

#### TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the Stipulation and Agreement of Settlement with exhibits, and all prior pleadings and proceedings had herein, Plaintiffs UA Local 13 Pension Fund, UA Local 13 & Employers Group Insurance Fund, Plumbers & Steamfitters Local 267 Pension Fund, and Plumbers and Steamfitters Local No. 7 Pension and Welfare Funds, by and through their attorneys, hereby move the Court, before the Honorable Louis L. Stanton, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for entry of the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice, agreed upon by all parties: (1) granting preliminary approval of the proposed settlement; (2) certifying the Class for Settlement purposes; (3) approving the form and manner of giving notice of the proposed settlement to the Class; and (4) setting a hearing date for final approval thereof, and a schedule for various deadlines relevant thereto. Defendants do not oppose the motion.

DATED: September 9, 2022 Respectfully submitted,

ROBBINS GELLER RUDMAN & DOWD LLP SAMUEL H. RUDMAN ROBERT M. ROTHMAN MARK T. MILLKEY ROBERT D. GERSON MAGDALENE ECONOMOU

### /s/ Robert M. Rothman

#### ROBERT M. ROTHMAN

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Additional Counsel for Lead Plaintiffs

# CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on September 9, 2022, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filing to all counsel registered to receive such notice.

/s/ *Robert M. Rothman*ROBERT M. ROTHMAN

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